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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 THOMAS P. GAGLIARDI)

11 Plaintiff,)

12 v.)

13 NANCY A. BERRYHILL,
Acting Commissioner of Social Security,)

14 Defendant.)
15)

Case No.: 2:17-cv-02009-RFB-CWH

UNOPPOSED MOTION FOR EXTENSION
OF TIME (FIRST REQUEST)

16
17 **I. INTRODUCTION**

18 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant")
19 respectfully requests that the Court extend the time for Defendant to file her response to Plaintiff's
20 Motion for Reversal and/or Remand, due on January 16, 2018 by 30 days, through and including
21 February 15, 2018.

22 Defendant respectfully requests this additional time because Defendant's counsel has a
23 higher than normal workload. This request is made in good faith with no intention to unduly delay
24 the proceedings.

25 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
26 motion, on January 11, 2018.

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3 Dated: January 11, 2018.
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Respectfully submitted

5 DAYLE ELIESON
6 Acting United States Attorney

7 /s/ Marcelo Illarmo
8 MARCELO ILLARMO
9 Special Assistant United States Attorney

10 IT IS SO ORDERED:

11 
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: January 12, 2018
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1 **CERTIFICATE OF SERVICE**

2 I, Marcelo Illarmo, certify that the following individual(s) were served with a copy of the
3 foregoing document on the date, and via the method of service, identified below:

4 **CM/ECF:**

5 David Chermol
6 E-mail: dave@ssihelp.us

7 Hal Taylor
8 Email: haltaylorlawyer@gbis.com

9 Dated *January 11, 2018*.

10 /s/ Marcelo Illarmo
11 **MARCELO ILLARMO**
12 Special Assistant United States Attorney
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